

ANNUAL AUDITED REPORT

FORM X-17A-5 PART III AND EXCHANGE COMMISSION NGTON, D.C. 20549

HR 120

OMB APPROVAL
OMB # 3235-0123
Expires May 31, 1987

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#### **FACING PAGE**

Information Required of Brokers and Dealers
Pursuant to Section 17 of the Securities
Exchange Act of 1934 and Rule 17a-5 Thereunder

SEC FILE NO. 840323

REPORT FOR THE PERIOD BEGINNI		AND ENDING 12/3			
	MM/DD/YY	MA	A/DD/YY		
A. REGISTRANT IDENTIFICATION					
NAME OF BROKER-DEALER:					
TREECE FINANCIAL SERVICES	7 (000		Official Use Only		
TREBUE FINANCIAL SERVICES	S CORP.				
	·		FIRM ID. NO.		
ADDRESS OF PRINCIPAL PLACE OF	BUSINESS:	REG			
(Do not use P.O. Box No.)		RECID S.E.O.			
6800 W. CENTRAL AVENUE		MAR 2 1 2000			
	(No. and Street)	2007			
TOLEDO	ОН	A second of the second second second	1		
(City)	(State)	5	43617 (Zip Code)		
(3.37	(5.4.5)		,-,-,-,-,		
NAME AND TELEPHONE NUMBER O	F PERSON TO CONTACT	IN REGARD TO THIS REPO	DRT		
DOCK D. TREECE					
DOCK D. INDECE		(Area Code —— Telephon	19) 843-7744		
	<del></del>				
	B. ACCOUNTANT IDEN	TIFICATION			
INDEPENDENT PUBLIC ACCOUNTANT	•	ned in this Report*			
(Name if individual, state last, first, n	niddle name)		·		
MIRA + KOLENA, LTD.					
4841 MONROE ST., SUITE 3	50 TOLEDO	ОН	43623		
(ADDRESS)	(City)	(State)	(ZIp Code)		
CHECK ONE:					
X Certified Public	: Accountant				
Public Accountant			PROCESSED		
Accountant not resident in United States or any of its possessions.			$\sim$		
	·		APR 0 5 2002		
	FOR OFFICIAL USE	ONLY	THOMSON		
			FINANCIAL		
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<sup>\*</sup> Claims for exemption from the requirement that the annual report be covered by the opinion of an independent public accountant must be supported by a statement of facts and circumstances relicd on as the basis for the exemption.

See section 240.17a-5(c)(2).

## OATH OR AFFIRMATION

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		Signature
		Tītl●
		Notary Public
00000	(a) (b) (c) (d)	Facing page Statement of Financial Condition Statement of Income (Loss) Statement of Changes in Financial Condition Statement of Changes in Stockholders' Equity or Partners' or
	(f)	Sole Proprietor's Capital. Statement of Changes in Liabilities Subordinated to Claims of Creditors. Computation of Net Capital
		Computation for Determination of Reserve Requirements Pursuant to Rule 15c3-3.
	<b>(i)</b>	Information Relating to the Possession or Control Requirements
⅓	(j)	Under Rule 15c3-3.  A Reconciliation, including appropriate explanation, of the Computation of Net Capital Under Rule 15c3-1 and the Computation for Determination of the Reserve Requirements
	(k)	Under Exhibit A of Rule 15c3-3.  A Reconciliation between the audited and unaudited Statements
_		of Financial Condition with respect to methods of consolidation.
	(m)	An Oath or Affirmation  A copy of the SIPC Supplemental Report  A report describing any material inadequacies found to exist or found to have existed since the date of the previous audit.

<sup>\*\*</sup> For conditions of confidential treatment of certain portions of this filing, see section 240.17a-5(e)(3).

## Treece Financial Services Corp.

# Computation of Net Capital Under Rule 15c3-1 of the Securities and Exchange Commission

#### Year Ended December 31, 2001

Net capital:	
Total shareholder's equity	\$ 64,402
Deductions of nonallowable assets:	
Notes receivable	35,900
Deferred federal income taxes	900
	36,800
Net capital	\$ 27,602
Aggregate indebtedness	\$ -
Computation of basic net capital - minimum net capital required	\$ 5,000
Excess net capital	\$ 22,602
Ratio - aggregate indebtedness to net capital	.00 to 1

Treece Financial Services Corp. net capital reported in Part II of Form X-17A-5 as of December 31, 2001 agrees to the net capital of \$27,602 reported above.



Charles J. Mira, J.D., CPA Thomas E. Kolena, CPA/ABV

Certified Public Accountants & Consultants

Mira+Kolena, Ltd. 4841 Monroe Street Suite 350 Toledo, Ohio 43623

419-474-5020 419-474-5072 Fax mk@mirakolena.com

Member of: American Institute of Certified Public Accountants

Ohio Society of Certified Public Accountants March 11, 2002

Mr. William H. Jackson, Jr. District Director NASD Regulation, Inc., District 8 1350 Euclid Avenue, Suite 650 Cleveland, OH 44115

Re: Treece Financial Services Corporation

Dear Mr. Jackson:



In response to your letter of March 6, 2001 (see attached) to Mr. Dock D. Treece, we have spoken to John W. Szwagulak, Associate Examiner, regarding two items involved in the December 31, 2001 annual filing of audited financial statements pursuant to SEC Rule 17a-5(d). The items noted have been resolved as follows:

Item (1) - A reconciliation, including appropriate explanations, of the audited computation of net capital and the broker/dealer's corresponding unaudited Part II or Part IIA if material differences existed, or if no material differences existed, a statement so stating.

Resolution - We have revised the schedule "Computation of Net Capital Under Rule 15c3-1 of the Securities and Exchange Commission" included in our December 31, 2001 audit report to include a statement indicating that no difference existed between the unaudited Part II computation of net capital and our audit report. We have enclosed an updated copy.

Item (2) - A report describing any material inadequacies found to exist, or if none existed, a statement so stating.

Resolution - We spoke with Mr. Szwagulak and referenced the first paragraph on page two of our Independent Auditors' Report on Internal Control Structure which stated:

"Our consideration of the internal control structure would not necessarily disclose all matters in internal control that might be a material weakness under standards established by the American Institute of Certified Public Accountants. A material weakness is a condition in which the design or operation of the specific internal control components does not reduce to a relatively low level the risk that error or fraud in amounts that would be material in relation to the financial statements being





Mr. William H. Jackson, Jr.

March 11, 2002

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audited may occur and not be detected within a timely period by employees in the normal course of performing their assigned functions. However, we noted no matters involving internal control, including control activities for safeguarding securities that we consider to be material weaknesses as defined above."

Mr. Szwagulak agreed that this statement was adequate to address the noted item.

We believe that we have adequately addressed and resolved these matters; however, please do not hesitate to contact either me or Dave Hiatt at (419) 474-5020 should you have any questions or comments.

Sincerely,

Thomas E. Kolena

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TEK/ms

Enclosures

cc: Mr. Dock D. Treece

U.S. Securities and Exchange Commission, Chicago, IL

U.S. Securities and Exchange Commission, Washington, D.C.



March 6, 2002

Mr. Dock D. Treece, President Treece Financial Services Corporation 6800 West Central Avenue Toledo, OH 43617

Dear Mr. Treece:

This acknowledges receipt of your December 31, 2001 annual filing of audited financial statements made pursuant to Securities and Exchange Commission (SEC) Rule 17a-5(d) (the Rule). The report as submitted appears deficient in that it did not contain the following:

- A reconciliation, including appropriate explanations, of the audited computation of net capital and the broker/dealer's corresponding unaudited Part II or Part IIA if material differences existed, or if no material differences existed, a statement so stating. SEC Rule 17a-5(d)(4)
- 2. A report describing any material inadequacies found to exist, or if none existed, a statement so stating. SEC Rule 17a-5(j).

Therefore, your submission cannot be considered to comply with the requirements of the Rule. The text of the Rule is reproduced in the *NASD Manual* under the section titled *SEC Rules & Regulation T*, and we suggest that you review it with your independent accountant.

Pursuant to the provisions of NASD Rule 8210, we request that you immediately send one copy of the items listed above to this office and to the SEC regional or district office, and two copies to the SEC Washington, D.C. office. Your submissions must include a new completed Part III Facing Page, a copy of which is enclosed for your convenience.

As noted on our Web site, <u>www.nasdr.com</u>, NASD Regulation will no longer open or accept any mail that does not have complete return names and addresses. Please be sure when sending mail to NASD Regulation that your information is fully and appropriately labeled.

Mr. Dock D. Treece March 6, 2002 Page 2

Please attend to this matter promptly. Failure to respond may result in disciplinary action. If you have any questions, please contact John W. Szwagulak, Associate Examiner, (216) 592-2979.

Sincerely,

William H. Jackson, <sup>v</sup>Jr.

**District Director** 

WHJ:jz

treece financial.5e.doc

Enclosure

cc: U.S. Securities and Exchange Commission, Chicago, IL

Mira + Kolena, Ltd., Toledo, OH

John W. Szwagulak, NASD Regulation